### **ARTE**

# Senior Living Community NEC 114<sup>th</sup> Street/Via Linda

### **Narrative, Analysis & Justification**

Request for Non-major General Plan Amendment "Office" to "Urban Neighborhood" 684-PA-2005

### I. Project Overview.

This request is for a non-major General Plan Amendment from the "Office" land use category to the "Urban Neighborhoods" land use category on 3.8 net acres located at the northeast corner of 114<sup>th</sup> Street and Via Linda (the "Property") to allow the Property to develop as a proposed senior living community (the "Development"). The Property is an undeveloped infill parcel with existing improved right-of-way, utilities, and commercial development to the south and west, townhomes and apartments to the north and northwest, and the CAP Canal to the east.

The Property is located within what is commonly referred to as the Ancala Village area and in Planning Zone C1 which covers the East Shea area and most major master planned developments. The property is located outside of the Shea Corridor Study Areas. The Property is designated as Suburban and within an Activity Center on the City's Character Types Map due to its proximity to the commercial centers at the intersection of Frank Lloyd Wright Boulevard and Via Linda. The Activity Center supports a wide range of activities, including higher density residential as well as community level retail and employment uses.

A thorough review of all of the elements of the General Plan and a review of the existing characteristics of the general area as well as a forecast of likely future development in the vicinity all suggests that the Property, from a planning perspective, is most viable and sustainable if developed for medium to higher density residential.

As stated in the opening sentence of the Vision Statement for the Land Use Section of the General Plan, "Scottsdale is first and foremost a residential community . . .". In determining the compatibility of this request with each of the elements of the General Plan, it is necessary that the proposed land use be both compatible with the specific area as well as the larger general context of the City of Scottsdale. The affirmative determination of a compatible land use within a particular context is qualified by determining if the proposed land uses conforms to the Guiding Principles established in the General Plan. The Property, given its size, adjoining and surrounding land uses, proximity to the commercial activity centers and general location within the City of Scottsdale, clearly meets and exceeds the Goals and Approaches articulated in the six Guiding Principles of the General Plan. Accordingly, this land use analysis and General Plan Amendment justification substantiates the proposed land use change while being consistent with the core planning principles of the City of Scottsdale.

### II. Conformance with the Guiding Principles of the General Plan.

This request is for a non-major General Plan Amendment to the Land Use Map contained in the Land Use element of the General Plan. As previously stated, six guiding principles articulate (via Goals and Approaches) how the appropriateness of a land use change to the General Plan is to be evaluated. These six guiding principles are Character and Lifestyle, Economic Vitality, Neighborhoods, Open Space, Sustainability and Transportation. Contained herein is a discussion of how this application and the proposed Development reflect and are emblematic of the Guiding Principles found within the City of Scottsdale's General Plan.

It is significant to note prior to the Guiding Principles discussion that the existing land use designation on the Property is Office. The Office land use is a component of Group E in the land use category matrix, the most intense category of land uses. This request is to designate the Property as Urban Neighborhoods, a Group C category in the land use matrix and in essence a reduction in the intensity of the development of the Property.

### III. Character and Design Element.

#### 1. <u>Guiding Principle, Character and Lifestyle.</u>

The Character and Lifestyle Guiding Principle contains two elements, the Character and Design element and the Land Use element. The Character and Design element of the Character and Lifestyle Guiding principle seeks to promote quality development and redevelopment that is sustainable and appropriate in striking a balance between natural desert settings, historical significant sites and structures and the surrounding neighborhood context. As the Property is neither located within an area that has developed within a natural desert setting nor is it a historically significant site, the discussion of character and design concerns itself exclusively to the surrounding neighborhood context.

Therefore, for the purposes of the Character and Design discussion of this General Plan Amendment, this application sets forth the proposed design standards, community character, and design review discussion with an emphasis on satisfying and complementing the Character and Design elements identified in the General Plan.

The Character and Design Element Map of the General Plan designates the Property as Suburban and within an Activity Center. Given that the Property is located on the periphery rather than the center of the Activity Center and within the Suburban setting, the proposed character and design of the Development should reflect this relationship.

In addition to the character and design factors discussed above, this non-major General Plan Amendment is consistent with the following Goals and Approaches contained within the Character and Design element as follows.

#### 1) Determine the appropriateness of all development in terms of community goals, surrounding area character, and the specific context of the surrounding neighborhood.

Response: The proposed senior living community satisfies this goal and approach by meeting the community goal of promoting infill development to take advantage of existing infrastructure and being compatible with the surrounding area character with higher density residential located northwest, townhomes to the north, office and retail to the west, retail to the south, and the CAP Canal to the east. The proposed Development is appropriate to the specific context of the surrounding neighborhood as it relates to locating compatible uses within the appropriate proximity of one another to further the balance of the General Plan's guiding principles to include transportation, economic vitality and neighborhoods.

## 2) Review the design of all development proposals to foster quality design that enhances Scottsdale as a unique southwestern desert community.

Response: The Development will be subject to Design Review Board approval where design and development professionals, appointed by the Mayor and City Council, will evaluate the proposed built environment and determine its compatibility with both the area and high design standard expected within the City of Scottsdale.

## 3) Identify Scottsdale's historic, archeological and cultural resources, promote an awareness of them for future generations, and support their preservation and conservation.

Response: The Property is not designated as historic, archeologically or culturally significant and correspondingly no preservation or conservation is necessary when determining the appropriateness of this General Plan Amendment.

## 4) Encourage "streetscapes" for major roadways that promote the City's visual quality and character and blend into the character of the surrounding area.

Response: As the Property is an infill parcel with frontage along the already developed Via Linda streetscape, special attention will be given to ensure that the proposed Development incorporates the existing streetscape character as significant part of its design integration into the built environment.

5) Build upon the significant role the arts have played in shaping our community's image and lifestyle by maximizing the potential of public art to enrich the daily lives of the people that live in or visit Scottsdale.

Response: Although publicly viewable art is not anticipated in conjunction with this project, artwork is major focus of the project's common areas and the genesis of the ARTE project name.

6) Recognize the value and visual significance that landscaping has upon the character of the community and maintain standards that result in substantial material landscaping that reinforce the character of the City.

Response: Although not within ESLO lands, the Property is on the perimeter of ESLO lands east of the CAP Canal. Consequently, the Development will utilize native plants as the primary plant palette especially where viewable from the public realm along the Via Linda and 114<sup>th</sup> Street frontages.

7) Encourage sensitive outdoor lighting that reflects the needs and character of different parts of the City.

Response: Lighting will be of low-intensity due to the residential nature of the Development with particular attention being paid to the adjoining townhome subdivision located north of the site.

#### 2. <u>Land Use Element.</u>

The Land Use Element Section of the Character and Lifestyle Guiding Principle establishes the City's mandate that land uses complement each other visually, aesthetically, socially, and economically, and to avoid conflicting, damaging or otherwise unwanted land uses from compromising the overall character of a site, neighborhood, or community. Given this overview of the

Vision Statement of the Land Use Element, it is imperative that an appropriate General Plan Use amendment demonstrate its compatibility while eliminating anticipated or unintended conflict or damage to the surrounding community and overall character of the City. While the Property's existing "Office" land use designation has been deemed appropriate, the proposed "Urban Neighborhoods" land use designation is equally if not more appropriate. Using the percentages provided in the Land Use element of the General Plan, with residential uses making up 54% of the existing land area and commercial land uses making up 2.5% of the land area in the City, the Property, as part of the existing land use base would not alter this overall ratio of residential to the commercial land uses. The proposed residential use for senior housing is actually superior to an office land use relative to its proximity to adjoining retail and service uses, and, given the demand for senior housing stock, appears to better satisfy the Land Use element of the Character and Design Guiding Principle.

The Land Use element of the Character and Design guiding principle establishes nine goals and approaches analyzed on both a regional and citywide context to determine the appropriateness of a proposed change in land use designations. The proposed Development addresses these nine goals as follows:

### 1) Recognize Scottsdale's role as a major regional economic and social center, featuring business, tourism and cultural activities.

Response: The existing "Office" land use designation appears no more superior than the proposed "Urban Neighborhoods" land use designation in satisfying the goal of recognizing Scottsdale as a cultural center or catalyst for cultural and/or tourist activities. Relative to supporting Scottsdale's role as a regional, economic, and business community, the existing "Office" land use designation might appear to better advance this element of the prescribed goal. However, in the context of the Property being on the edge of an Activity Center which has existing office and commercial retail, the proposed senior housing project creates a better opportunity to continue Scottsdale's role as a major regional economic and business community by placing increased numbers of consumers in a relatively small infill parcel which since the property was rezoned in 1986 has had no user interest for office development (as demonstrated by the abandonment of a proposed office condo project approved in 2004).

2) Coordinate land uses affecting regional networks (mobility, economic, and open space) with adjacent jurisdictions to maintain the integrity and efficiency of each network.

Response: The proposed land use does not affect regional networks.

3) Encourage the transition of land uses from more intense, regional and citywide activity areas to less intense activity areas within local neighborhoods.

Response: The proposed senior housing development provides a better transitional land use than office from the more intense commercial office and retail land uses to the west and south to the less intense existing medium to higher density residential located north and northwest of the site. Generally, the existing "Office" land use provides an appropriate transitional land use but, given the Property's lack of development interest over the past twenty years (especially when the office condo market has been booming), the proposed "Urban Residential" land use appears to make the most sense as it relates to both the General Plan, the market conditions, and the residential area immediately to the north.

4) Maintain a balance of the land uses that support a high quality of life, a diverse mixture of housing and leisure opportunities, and the economic base needed to secure resources to support the community.

Response: As previously mentioned, using the citywide ratio of residential uses to commercial land uses, the proposed development plan reflects the citywide mix of residential to commercial land uses. As to maintaining a high quality of life and diverse mixture of housing, the subject senior housing is being proposed in area where there is no senior housing and being adjacent to other residential uses achieves both goals better than the current office designation.

5) Give developed land use patterns that are compatible with and support a variety of mobility opportunities/choices and service provisions.

Response: A major component of the Property's attraction for senior housing is the close proximity to the commercial centers at FLWB and Via Linda which are easily accessible by a variety of mobility options including on-site shuttle vehicles for residents. Furthermore, public transportation is immediately available on Via Linda which provides alternative regional access.

## 6) Promote land use patterns that conserve resources such as land, clean air, water and energy to serve all people within the community.

Response: As an infill project, the development of the Property will take advantage of existing utilities and of infrastructure. The close proximity of complementary land uses to support a live/work/play environment helps promote the conservation of clean air, clean water and energy to the benefit of the entire community.

## 7) Sensitively integrate land uses into the surrounding physical and natural environments, the neighborhood setting and the neighborhood itself.

Response: Having recognized that both the office and higher density residential uses provide an appropriate transition from commercial cores and arterial streets, the proposed senior housing provides a lower intensity transition than office to the existing townhome subdivision north of the Property and helps to justify and satisfy the local land use relationship.

## 8) Encourage land uses that create a sense of community among those who work, live, and play within local neighborhoods.

Response: The proposed senior housing attracts most of its residents from within a 10 mile radius thereby allowing its residents to "age in place" and sustaining the sense of community.

### 9) Provide a broad variety of land uses that create a high level of synergy within mixed use neighborhoods.

Response: As previously stated, providing senior housing adds a new residential component to the area which creates increased demand for goods and services for businesses within the Activity Center.

#### IV. Economic Vitality.

The economic vitality guiding principle is intended to secure Scottsdale's future as a desirable place to live, work and visit based on the support of a dynamic, diversified and growing economic base that complements the community. The economic vitality guiding principle relies on seven goals and approaches which, when applied to a proposed General Plan amendment help to determine if a land use proposal advances Scottsdale's economic vitality goals articulated in their Vision Statement.

1) Sustain and strengthen Scottsdale's position as a premiere international and national tourism destination and resort community.

Response: The Property has neither been intended to be developed as a resort or tourism use nor is it being proposed to be developed as a resort or tourism use. However, by providing senior housing, it is anticipated that the residents and their visitors will support and frequent Scottsdale's resorts and facilities.

2) Encourage and maintain a high level of diverse, quality, retail, and entertainment activity in Scottsdale that supports the needs of Scottsdale residents and visitors.

Response: By locating the proposed senior housing on the edge of an Activity Center, the existing retail and service businesses can be directly accessed and supported by residents and their visitors.

3) Encourage and support the diversity of businesses that contribute to Scottsdale sales and property tax base so the needed infrastructure, physical amenities, services and expansion of such services are provided.

Response: As an infill project for senior housing, the City's burden to provide infrastructure, physical amenities and services is not adversely impacted.

4) Foster new and existing economic activities and employment opportunities that are compatible with Scottsdale's lifestyle.

Response: As the City's population continues to age in ever-increasing numbers, the opportunities for the provision of goods and services to this booming segment of the population will result in increasing economic and employments activities.

## 5) Locate and integrate nonresidential development to improve access and visibility and to protect the integrity of neighborhoods.

Response: The proposed change in land use designation accomplishes this goal and approach by integrating a more compatible residential land use into an existing residential area while eliminating that land area from potentially more intrusive but currently permitted land uses such as medical office, bank, church, or daycare.

### 6) Maintain and develop partnerships that will promote both quality employment and business opportunities.

Response: The proposed senior housing development provides an opportunity for residents to support local retail and service businesses.

### 7) Sustain a long term economic well being of the City and its citizens through redevelopment and revitalization efforts.

Response: As an infill project aimed at providing senior housing for local residents, the development of the Property could be considered as revitalization by taking an undeveloped parcel and transforming it into a sustainable and vital development positively impacting the area.

### V. Neighborhoods.

The Neighborhood section of the General Plan focuses on Scottsdale's vision to preserve, reinforce, and where appropriate, revitalize the core characteristics and stability that define all neighborhoods. This is accomplished by making sure that neighborhoods are in harmony with their existing character and defining features. Particular attention is paid to the unique character and special qualities of each individual neighborhood within the City of Scottsdale.

In the context of developing the Property, the surrounding "neighborhood" is best characterized as a diversely mixed use combination of retail commercial, small scale office and medium to higher density residential development. Given the specific physical location of the Property, any combination of the aforementioned uses should be deemed appropriate in the context of the General Plan's Guiding Principle for sustainable neighborhoods.

This application and the proposed senior housing development are clearly appropriate in the context of the neighborhood in which the property would be developed and in the definition of the Neighborhood section of the General Plan.

The Neighborhood's Guiding Principle of the General Plan enumerates five goals and approaches intended to ensure that Scottsdale is a desirable place to live, work and visit. In conjunction with a stable economic base, the General Plan recognizes that a neighborhood viability and sustainability is as equally important as a strong economic base.

### 1) Enhance and protect diverse neighborhoods so they are safe and well maintained.

Response: The aforementioned goal and approach primarily addresses four critical path items including providing neighborhood recreational facilities and parks and, more importantly, providing a range of housing opportunities. Emphasis is based on maintaining a balance between neighborhoods regarding resources, public amenities and burdens of community living. The development proposed herein is particularly complementary of this goal and approach as the Property is an infill parcel which takes advantage of existing public resources, utilities and infrastructure while providing a significant under-served senior housing opportunity.

## 2) Use redevelopment and revitalization efforts to provide for long term stability of Scottsdale's mature residential and commercial neighborhoods.

Response: The Property is located in one of Scottsdale's established areas and as an infill versus redevelopment project, helps to reinforce the existing general land use character of the area which contains a predominantly medium to high density residential.

## 3) Sustain the long term economical being of the City and its citizens through redevelopment and neighborhood preservation and revitalization efforts.

Response: Development of the Property with high-quality senior housing will help support the long-term financial health of the City and its citizens.

### 4) Preserve and enhance the unique sense of neighborhood found in diverse areas of Scottsdale through neighborhood conservation.

Response: The Property is not within a Character Area or designated with a specific Neighborhood Plan. However, the General Plan specifically states that new development in established areas should be encouraged to develop in a context that supports the surrounding areas.

### 5) Promote and encourage context appropriate new development in established areas of the community.

Response: The proposed Development is particularly adept at satisfying this goal and approach as the General Plan encourages new development efforts in existing developed areas in Scottsdale and the use of existing infrastructure while supporting developed areas in a manner that is both complementary and sustainable.

In summary, the proposed Development satisfies each of the goals and approaches articulated in the Neighborhoods Section of the General Plan.

#### VI. Open Space and Recreation.

It has long been a priority of the City of Scottsdale to conserve significant natural area and open space to provide both recreational amenities and the preservation of undisturbed natural areas.

The Open Space and Recreation guiding principle found within the General Plan specifically addresses the significance of the McDowell Sonoran Preserve, scenic corridors, natural and urban open spaces and recreational opportunities. The development proposed herein indirectly aids the General Plan goal of preserving significant open space by providing senior housing in an already established area which relieves to a certain extent the common trend to develop more remote lands within the City. It is a widely accepted planning principle that by clustering densities the opportunity to preserve appreciable open space can be achieved. Specifically, this element of the General Plan includes eight goals and approaches intended to continue Scottsdale's tradition of providing significant open space and recreational opportunities intended to meet the needs of the population.

## 1) Protect and improve the quality of Scottsdale's natural and urban environments as defined in the quality and quantity of its open space.

Response: Although located in an already developed and established suburban context, the Property does contain onsite native plant material which will be integrated into the project's open space planning. Furthermore, as a residential rather than an office project, open spaces are sized and developed as valuable project amenities for the residents which also benefit the community as a whole. Likewise the senior housing component places very little (if any) demand on the City's public parks and open spaces.

2) Manage a comprehensive open space program that is responsive to public need, delivers high quality customer service, and exemplifies the City's commitment to leadership in environmental affairs.

Response: This goal and approach concerns itself primarily with larger planning issues and master planning. Satisfaction of this goal and approach is accomplished by the proposed Development by providing housing for seniors to take advantage of existing open space opportunities and by locating consumers near and in fact adjacent to commercial retail opportunities (further supporting the retail sales tax base which funds the maintenance and development of parks, trails, open spaces and recreational facilities).

3) Acquire and develop open space identified (by the City Council) as high priority through land dedication or purchase.

Response: The project proposed herein is somewhat unrelated to this goal and approach. In an indirect way approval of this General Plan amendment will allow residential development in an existing established part of the City as an infill project and thereby potentially reducing pressure to develop similar housing on more sensitive property elsewhere.

4) Encourage and cooperate with other governmental agencies to preserve and protect regional open space and to acquire, develop, maintain, and operate regional facilities available to people who live, work and visit the City of Scottsdale.

Response: This request does not affect regional cooperation on preserving and protecting regional open.

5) Improve the quality of life for all Scottsdale residents by ensuring a wide range of recreational facilities and services.

Response: The proposed senior housing will likely place little (if any) demand on the existing open space and recreational facilities in the area. Conversely, the project will likely provide additional per capita spending to support the tax base used to pay for the development and maintenance of recreational facilities and services.

6) Cooperate with and support the school districts in the City of Scottsdale to be able to continue access to school sites and facilities for suitable, safe and consistent recreational use and enjoyment.

Response: As with the current office land use designation, the proposed senior housing will place no demand on Scottsdale's school districts and their educational or recreational facilities.

### 7) Provide attractive, well maintained recreational and park facilities that serve the entire community.

Response: Although development of the Property with senior housing does not directly further this goal and approach, indirectly revenues from construction, property and sales taxes will help further the aforementioned goal and approach.

### 8) Provide access to educational, recreational, and cultural services for all residents.

Response: The proposed development supports this goal and approach by providing senior housing within walking, bus, or shuttle distance to local schools, parks, and libraries.

#### VII. Preservation and Environmental Planning

The Preservation and Environmental Planning section of the General Plan does not directly apply to the proposed development of the Property. However, within this section of the General Plan, two goals and approaches are appropriate and addressed below.

### 1) Reduce energy consumption and promote energy conservation.

Response: By promoting infill development and by placing residential housing immediately adjacent to retail, personal services and recreational facilities, the ability to reduce personal vehicle use and conserve energy is enhanced. Likewise the modest square footage of senior housing units provides significantly lessened demand for energy and other utilities with corresponding reduction in short and long-term costs associated with energy production and usage.

### 2) Promote local and regional efforts to include air quality.

Response: As mentioned above, development of the Property as senior housing allows residents to access commercial retail uses such as grocery stores, restaurants, and personal services all by walking less than two city blocks.

Finally, the Property is not located within any of the areas designated on the Preservation and Environmental Planning Element Preservation Map contained within the General Plan.

#### VIII. Seek Sustainability.

The issue of sustainability is addressed within three chapters of the General Plan that include the following:

#### 1) Cost of development.

The City of Scottsdale has long held the philosophy that new development should "pay for itself". Through development impact fees, city bond projects, improvement districts, and community facility districts, the City of Scottsdale ensures that development pays its fair share.

The goals and approaches enumerated within this section of the General Plan concern themselves with providing the City with updated economic information used to manage and revise as needed the devices in place to ensure the development pays for itself. In this instance, through water and sewer impact fees to be paid at the time of development, the project will comply with this goal. Furthermore, the project's impacts on publicly provided facilities (roads, schools, parks, police, general government, etc) are significantly less than other residential or commercial land uses.

#### 2) Growth areas.

The Property is an infill parcel located in an existing established suburban area and within the periphery of an existing Activity Center. Accordingly, the proposed General Plan amendment is in harmony with the Growth Areas Section of the General Plan as it proposes residential development outside of the identified growth area and does not place a burden on future transportation and infrastructure systems.

The Property is not identified on the Growth Areas Map found in the Growth Areas element of the General Plan.

#### Public services and facilities.

This section of the General Plan deals with public services, human services, safety, public buildings and facilities, and water resources.

The proposed General Plan amendment and re-designation of the Property from "Office" to "Urban Neighborhoods" supports the goals and approaches enumerated in this section of the General Plan.

## 1) Establish and maintain an innovative, sustainable solid waste collection, recycling and disposable delivery system present in future generations.

Response: As an infill project, the City's ability to provide solid waste collection, recycling and disposable delivery is preserved as these services are already provided around the Property. By developing the Property as an infill project, the City's cost for service are absorbed better than if the Property were developed in one of the outlying sections of the City that would require the City to expend additional economic resources to provide such services.

### 2) Protect the health, safety, and welfare of the public from the impacts of flooding.

Response: The Property is not located in an identified flood plain and is in an already established and developed area of the City that is not identified as having a flood hazard.

As an infill project within an already mature developed area consisting of a significant percentage of medium to higher density residential, commercial and office uses, the City's ability to provide services under an efficient cost structure takes advantage of the economy of scale that exists already. Further, the City's ability to provide fire, police and paramedic services is not burdened as this area is already serviced and effectively has the capability of absorbing the impact of the proposed development.

### IX. Advance Transportation.

This section of the General Plan addresses mobility choices to provide alternatives to the automobile and to increase accessibility, improve air quality, enrich the community and its neighborhoods, and contribute to the community's quality of life. There are twelve goals and approaches identified in the Community Mobility Section of the General Plan. In general relate to protecting the function and form of regional air and land corridors, protecting the physical integrity of regional networks to reduce the number, length and frequency of automobile trips. Additionally, this section of the General Plan seeks to prioritizing regional connections to safely and efficiently move people and goods

beyond City boundaries, to relieve traffic congestion, to optimize mobility, maintain Scottsdale's high aesthetics, emphasize live/work/play opportunities, and to protect neighborhoods from the negative impact of regional and citywide networks.

Finally, the General Plan recognizes that there is diversity throughout the neighborhoods of the City and that each neighborhood may, in fact, have different mobility needs.

First and foremost as stated throughout this narrative, the infill nature of the proposed development provides an excellent opportunity to place lower intensity senior housing adjacent to and easily within walking distance of retail goods, personal services, recreational and educational opportunities, and is ideally suited for this area.

In the larger regional context, locating the residential land use on the Property with its proximity to Via Linda, FLWB, and Shea Boulevard, necessary automobile trips can quickly and efficiently access these major roadways which allows for the efficient transportation of individuals both throughout the City and throughout the larger metropolitan Phoenix area as a whole.

### X. Neighborhood key issues/program modification

As of the date of this initial submittal of the General Plan amendment, the only response to the neighborhood outreach has been by the two adjoining residents and two members of the Adobe Ranch Villas HOA. Discussion items included the following: concerns for privacy of the two adjoining backyards/patios; maintaining low activity areas on the northern end of the project; no nearby refuse enclosures or emergency vehicle access through their subdivision; no alternative apartment use of the property; and landscaping goals for the buffer areas opposite back yards and the 114<sup>th</sup> Place dead-end.

As the development team had earlier identified these as potential issues, the plan has been developed to provide significant screening of the two backyards and the 114<sup>th</sup> Place dead end by utilizing large salvage trees in the buffer area and allowing the two adjacent homeowners the opportunity to select the type of trees closest to their units. Activity areas are concentrated within the center of the project and refuse collection occurs within the building with the loading area located opposite the subdivision's detention basin. No connection to 114<sup>th</sup> Place – emergency or otherwise – has been proposed. Likewise, the owner/developer has no intent to alternatively allow or develop anything but senior housing. To date the relationship with these neighbors and development team has been positive, cooperative and supportive.

#### IX. Conclusion.

Each element of the General Plan provides goals and approaches which, when satisfied, creates the basis for a change in the Land Use Map of the General Plan. This application which seeks to change the General Plan designation of the Property from "Office" to "Urban Neighborhoods" clearly satisfies virtually every goal and approach identified in each element of the General Plan which is applicable to this site.